

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:

WELLPATH HOLDINGS, INC., et al.,<sup>1</sup>  
  
Debtors.

Chapter 11

Case No. 24-90533 (ARP)

Jointly Administered **Re:**

**Docket No. 439**

**DECLARATION OF DISINTERESTEDNESS OF  
CADES SCHUTTE A LIMITED LIABILITY LAW PARTNERSHIP LLP PURSUANT  
TO THE ORDER AUTHORIZING THE RETENTION AND COMPENSATION OF  
CERTAIN PROFESSIONALS UTILIZED IN THE ORDINARY COURSE OF BUSINESS**

I, THEODORE D. C. YOUNG, declare under penalty of perjury:

1. I am a Partner of Cades Schutte A Limited Liability Law Partnership LLP, located at 1000 Bishop Street, Honolulu, Hawaii 96813 (the “Firm”).

2. Wellpath Holdings, Inc. and certain of its affiliates (collectively, the “Debtors”), each of which is a debtor and debtor in possession in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), have requested that the Firm provide legal services to certain of the Debtors who were named as Defendants in litigation that was filed prepetition in the First Circuit Court for the State of Hawaii, and the Firm has consented to provide those services.

3. Pursuant to rule 2014 of the Federal Rules of Bankruptcy Procedure, the Firm hereby confirms that, to the best of its knowledge and belief, the Firm may have performed services in the past, may currently perform services, and may perform services in the future, in matters unrelated to these Chapter 11 cases, for persons that are claimants or other parties in interest in

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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/Wellpath>. The Debtors’ service address for these chapter 11 cases is 3340 Perimeter Hill Drive, Nashville, Tennessee 37211.

these Chapter 11 cases. The Firm does not perform services for any such person in connection with these Chapter 11 cases.

4. Neither I nor any partner or associate of the Firm, insofar as I have been able to ascertain, holds, or represents any interest adverse to the Debtors or their estates with respect to the matters on which the Firm is to be employed.

5. Neither I nor any partner or associate of the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any person other than partners and associates of the Firm.

6. The Debtors owe the Firm \$4,859.20 for prepetition services.

7. I further understand that this Declaration will not suffice as the Firm's proof of claim against any of the Debtors.

8. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors and, upon conclusion of that inquiry or at any time during the period of its employment, if the Firm should discover any facts bearing on the matter described herein, the Firm will supplement the information contained in this declaration.

9. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: Honolulu, Hawaii, December 23, 2024.

/s/ Theodore D. C. Young  
THEODORE D. C. YOUNG